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April 27, 2020

Via ECF

Hon. Vernon S. Broderick
United States District Judge
United States District Court
Southern District of New York
Thurgood Marshall United States Courthouse
40 Foley Square, Room 415
New York, NY 10007

APPLICATION GRANTED
SO ORDERED 
VERNON S. BRODERICK
U.S.D.J. 9/25/2020

**Re: *Powell, et al. v. Ocwen Financial Corp., et al.*, No. 1:18-cv-01951 (VSB)
(S.D.N.Y.)**

Dear Judge Broderick:

We represent the Plaintiff trustees of the United Food & Commercial Workers Union and Employers Midwest Pension Fund ("UFCW"). In accordance with Your Honor's Individual Civil Rules & Practices Rule 5(B), we write to request your approval to file Exhibit 15 under seal. Exhibit 15 is the deposition transcript of Ocwen's 30(b)(6) witness Michael Jay Williams, filed as Exhibits 15.1 and 15.2 on the public docket as ECF Nos. 247.04 and 247.05. On Wednesday, April 22, 2020, Defendants sent us an email requesting that we withdraw the filing and refile under seal. The purpose for filing under seal as explained by Defendants is because the deposition transcript was designated as confidential because it contained nonpublic personal information protected from public disclosure under the Gramm-Leach-Bliley Act. *See Williams Tr. 179:7-180:13.* Plaintiffs had the exhibit removed from the public docket on April 22, 2020 and are now filing it under seal pursuant to the agreed-to Protective Order. ECF No. 163.

Respectfully submitted,

/s/ Justin S. Brooks

Justin S. Brooks

cc: Counsel of Record (via ECF)